

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

<b>BRYAN SAMS,</b>	)	
Plaintiff,	)	
	)	
<b>vs.</b>	)	<b>Case No. 4:24-cv-00602-SH</b>
	)	
<b>JOHNSON MATTHEY, INC., d/b/a</b>	)	
<b>TRACERCO, a foreign corporation,</b>	)	
<b>THE UNIVERSITY OF TULSA, a not-for-</b>	)	
<b>profit, Oklahoma Corporation,</b>	)	
<b>CHEVRON USA, INC., a foreign corporation</b>	)	
<b>CHASE ENVIRONMENTAL GROUP, INC.</b>	)	
<b>a foreign corporation,</b>	)	
<b>CHINA INSTITUTE OF ATOMIC ENERGY,</b>	)	
<b>a foreign corporation,</b>	)	
Defendants.	)	

**UNOPPOSED MOTION TO EXTEND TIME TO ANSWER THE MOTION TO  
DISMISS OF DEFENDANTS JOHNSON MATTHEY, INC., CHEVRON USA, INC.,  
CHASE ENVIRONMENTAL GROUP, INC., [Doc. 25] AND THE UNIVERSITY OF  
TULSA [Doc. 26]**

**COME NOW**, Plaintiff, Bryan Sams, by and through his attorneys of record, G. Gene Thompson, Esq., and Charles C. McCaskey, Esq., of CREEK COUNTY LAW, PLLC, and moves this Court to enter an *Order Extending Time to Responded to Defendants' Johnson Matthey, INC., Chevron USA, INC., Chase Environmental Group, INC., [Doc. 25] and the University of Tulsa [Doc. 26]* by twenty-one days. To-wit, he states and alleges the following.

1. All Defendants filed their *Motion to Dismiss*("Motion") on February 24, 2024.
2. That Plaintiff's Counsel reached out to Defendants' Counsel through Michael S. Linscott.
3. Mr. Linscott said that he would communicate with all Defendants, and it was conveyed that all Defendants agreed to an extension.
4. A extending the time to answer will not delay the trial date further.
5. The above constitutes good cause to allow additional time to answer.

**WHEREFORE**, premise considered, Plaintiff prays this Court extend the time to answer Defendants' *Motion* by twenty-one days, and any other relief that the Court finds are proper and just.

Respectfully submitted,

s/ Charles C. McCaskey

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**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 14<sup>th</sup> day of March 2025, a true and complete copy of the above and the foregoing *REPLY TO BIXBY'S RESPONSE TO MOTION TO SUBSTITUTE (ECF Doc. 43)* was served using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

**Johnson Matthey, Inc.**  
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